

222 (Ex 6159) Area Warant

UNITED STATES DISTRICT COURT

for the  
District of Nevada

10-09-156-FHM

United States of America )  
v. )  
LINDA LIVOLSI ) Case No. 2:10-cr-578  
Defendant )

**ARREST WARRANT**

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay  
*Name of person to be arrested* LINDA LIVOLSI  
who is accused of an offense or violation based on the following document filed with the court:

Indictment     Superseding Indictment     Information     Superseding Information     Complaint  
 Probation Violation Petition     Supervised Release Violation Petition     Violation Notice     Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 1349 - CONSPIRACY TO COMMIT WIRE FRAUD  
18 U.S.C. § 1343 - WIRE FRAUD

LANCE S. WILSON

— 1 —

Lance S Wilson

THE DEPUTY CLERK



12/1/2010 Las Vegas, NV

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DATE

<b>Return</b>		
This warrant was received on <i>(date)</i> , _____, and the person was arrested on <i>(date)</i> , _____ at <i>(city and state)</i> _____.		
Date: _____	<i>(Arresting officer's signature)</i>	
<i>(Printed name and title)</i>		

318E-LV-40423

1 DANIEL BOGDEN  
2 United States Attorney  
3 MICHAEL CHU  
4 Assistant United States Attorney  
333 Las Vegas Blvd. South, Suite 5000  
Las Vegas, Nevada 89101  
(702) 388-6336

APR 06 2011 11:31 AM

5  
6 UNITED STATES DISTRICT COURT  
7 DISTRICT OF NEVADA

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9 UNITED STATES OF AMERICA,

) CRIMINAL INDICTMENT

10 Plaintiff,

) 2:10-CR- 598

11 v.

) VIOLATIONS:

12 LINDA LIVOLSI,  
aka Linda Grogg.

18 U.S.C. § 1349 - Conspiracy to  
Commit Wire Fraud

13 Defendant

18 U.S.C. § 1343 - Wire Fraud

15 THE GRAND JURY CHARGES THAT:

16 At all times relevant to this Indictment:

17  
18 COUNT ONE  
Conspiracy to Commit Wire Fraud

19 1. From a date no later than in or about 2006, to in or about 2010, in the State  
20 and Federal District of Nevada and elsewhere.

21 LINDA LIVOLSI,  
22 aka Linda Grogg.

23 defendant herein, did knowingly and willfully combine, conspire, and agree with others  
24 known and unknown to the grand jury to commit the crime of wire fraud, that is, the  
25 defendant and others did devise, intend to devise, and participate in a scheme and artifice  
26 to defraud and for obtaining money and property by means of materially false and fraudulent

1 pretenses, representations, and promises, and for the purpose of executing the scheme and  
2 artifice did transmit and cause to be transmitted money by means of wire communications  
3 in interstate and foreign commerce, in violation of Title 18, United States Code, Section  
4 1343.

## The Objective of the Conspiracy

6. 2. The objective of the conspiracy was to obtain money and property by  
7 defrauding victims into believing that the defendant would invest their money in a hedge fund  
8 when the defendant fraudulently intended to use the money for her personal benefit.

## Manner and Means of the Conspiracy

10 3. It was part of the conspiracy that the defendant solicited people to allow them  
11 to invest their money in a hedge fund.

12       4. It was part of the conspiracy that defendant falsely and fraudulently induced  
13 people to invest with her by representing that she was an investment advisor to a hedge  
14 fund that would invest in publicly traded companies, and that her hedge fund had a track  
15 record of outstanding returns, when she then and there well knew that she would not invest  
16 their money in a hedge fund.

17 5. It was a further part of the conspiracy that the defendant provided to victims  
18 fraudulent documents that purported to support the existence and track record of her hedge  
19 fund when the defendant then and there well knew that she did not intend to invest their  
20 money in the hedge fund.

21           6. It was a further part of the conspiracy that defendant did not invest the  
22 investors' money in her hedge fund.

23       7. It was a further part of the conspiracy that the defendant and her  
24 co-conspirators used the money to pay for personal purchases and expenses.

25 8 It was a further part of the conspiracy that defendant caused "account  
26 statements" to be sent to victims to lull them and prevent them from questioning whether

their money had, in fact, been invested, where these statements falsely listed the investments purchased by the hedge fund.

3           9. It was a further part of the conspiracy that when victims tried to withdraw their  
4 money from the "hedge fund," the defendant and her co-conspirators acted to delay and  
5 deceive to prevent the victims from complaining to law enforcement.

6. All in violation of Title 18, United States Code, Section 1349.

COUNT TWO  
Wire Fraud

9           10. The allegations set forth in Count One are re-alleged and incorporated as if  
10 fully set forth herein.

11. From in or about 2006, to in or about 2010, in the State and Federal District  
12. of Nevada and elsewhere.

LINDA LIVOLSI,  
aka Linda Grogg.

15 defendant herein, did devise and intend to devise, and participate in a scheme and artifice  
16 to defraud and for obtaining money and property by means of materially false and fraudulent  
17 pretenses, representations and promises.

18. 12. On or about the date set forth below, for the purpose of executing the  
19. scheme, defendant did cause to be transmitted by means of wire communication in  
20. interstate commerce the following writings, signs, signals, and sounds, with each  
21. transmission constituting a separate violation of Title 18, United States Code, Section 1343:

Count	Date	Wire
2	December 4, 2007	Wire transfer of \$5,015,000.00 from E.B. of Maryland to RGM Enterprises LLC in Nevada, Wachovia Bank account xxxxxx:xxx3450.

All in violation of Title 18, United States Code, Section 1343.

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3  
**FORFEITURE ALLEGATION**  
4 Conspiracy to Commit Wire Fraud and Wire Fraud  
5  
6

7 1. The allegations of Counts One and Two of this Indictment are hereby  
8 realleged and incorporated herein by reference for the purpose of alleging forfeiture  
9 pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28,  
10 United States Codes, Section 2461(c).

11 2. Upon a conviction of the felony offenses charged in Counts One and Two of  
12 this Indictment,

13 LINDA LIVOLSI,  
14 aka Linda Grogg.  
15

16 defendant herein, shall forfeit to the United States of America, any property which  
17 constitutes or is derived from proceeds traceable to violations of Title 18, United States  
18 Code, Section 1343, a specified unlawful activity as defined in Title 18, United States Code,  
19 Sections 1956(c)(7)(A) and 1961(1)(B), and Title 18, United States Code, Section 1349; a  
20 conspiracy to commit such offense, an *in personam* criminal forfeiture money judgment up  
21 to \$5,015.000.00 in United States Currency.

22 3. If any property being subject to forfeiture pursuant to Title 18, United States  
23 Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), as a result  
24 of any act or omission of the defendant –

25 a. cannot be located upon the exercise of due diligence;  
26 b. has been transferred or sold to, or deposited with, a third party;  
1 c. has been placed beyond the jurisdiction of the court;  
2 d. has been substantially diminished in value; or  
3 e. has been commingled with other property that cannot be divided  
4 without difficulty;

1 it is the intent of the United States of America, pursuant to Title 21, United States Code,  
2 Section 853(p), to seek forfeiture of any properties of the defendant up to \$5,015,000.00 in  
3 United States Currency.

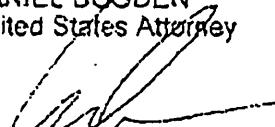
4 All pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28,  
5 United States Code, Section 2461(c); Title 18, United States Code, Section 1343, a  
6 specified unlawful activity as defined in Title 18, United States Code, Sections 1958(c)(7)(A)  
7 and 1961(1)(B); Title 18, United States Code, Section 1349; and Title 21, United States  
8 Code, Section 853(p).

9 DATED: this 1 day of December 2010.

10 A TRUE BILL:

11  
12 /S/  
13 FOREPERSON OF THE GRAND JURY

14 DANIEL BOGDEN  
United States Attorney

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17 MICHAEL CHU  
Assistant United States Attorney

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